

**FILED**

MAY 12 2025

U.S. Court of Appeals  
Eighth Circuit- St. Paul, MN

**UNITED STATES COURT OF APPEALS  
FOR THE EIGHTH CIRCUIT**

Claudia Russ Anderson,  
  
Petitioner-Appellant,  
  
v.  
  
OCC,  
  
Respondent-Appellee.

No. 25-1079

**JOINT MOTION FOR PERMISSION TO FILE UNDER SEAL**

Pursuant to Fed. R. App. P. 27 and Eighth Circuit Rule 25A(h), Petitioner Claudia Russ Anderson and Respondent OCC (“the Parties”) respectfully move for permission for Petitioner to file her Addendum under seal, and to file a redacted version of the same via the CM/ECF system. The Parties also move for permission to file their respective Briefs under seal, and to file redacted versions of the same via the CM/ECF system, should the parties’ Briefs reference sealed material contained in the Addendum or administrative record.

In support of these requests, the Parties state as follows:

1. On December 5, 2022, the Administrative Law Judge (“ALJ”) filed a temporarily sealed Report and Recommendation in this matter. (A.R. 534.) A redacted version of the same was filed December 23, 2022. (A.R. 542.)

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2. On December 17, 2024, the Comptroller of the Currency filed his “Provisional” Final Decision and Order, (A.R. 576.) with an accompanying order temporarily sealing the same. (A.R. 579.)

3. On January 14, 2025, the Comptroller filed a redacted version of the Final Decision and Order. (A.R. 583.)

4. Additionally, the OCC filed a Certified Index of Record on February 25, 2025, which collectively identified over 1,000 documents and exhibits in the administrative record that are under seal. (*See* Attachments A & B of the OCC’s Certified Index of Record.)

5. Pursuant to Eighth Circuit Rule 28A(g), Petitioner’s Addendum must contain a copy of the Comptroller’s Final Decision and Order and the ALJ’s Report and Recommendation, both of which were filed under seal and subsequently redacted.

6. Petitioner seeks to file a sealed Addendum containing the sealed/unredacted decisions and orders, and to file a publicly available redacted Addendum containing the redacted decisions and orders via the CM/ECF system.

7. Should the Parties’ Briefs—including Petitioner’s Reply—reference sealed material contained in the Addendum or sealed documents identified in Attachments A and B of the Certified Index, they seek to file under seal their

respective unredacted Briefs, and to file publicly available Briefs with redactions to any sealed material via the CM/ECF system.

8. The Parties believe this motion may be made publicly available on PACER.

WHEREFORE, the Parties respectfully request that this Court:

1. Grant Petitioner permission to file under seal her Addendum containing the sealed version of the Comptroller's Final Decision and Order (A.R. 576) and the sealed version of the ALJ's Report and Recommendation (A.R. 534);

2. Grant Petitioner permission to file via the CM/ECF system a redacted Addendum containing the redacted version of the Comptroller's Final Decision and Order (A.R. 583) and the redacted version of the ALJ's Report and Recommendation (A.R. 542);

3. Grant the Parties permission to file under seal their respective Briefs, including Petitioner's Reply, should their Briefs reference sealed material contained in the Addendum or administrative record;

4. Grant the Parties permission to file a redacted version of their respective Briefs, including Petitioner's Reply, via the CM/ECF system should their Briefs reference sealed material contained in the Addendum or administrative record.

Respectfully submitted,

**KELLEY, WOLTER & SCOTT, P.A.**

Dated: May 12, 2025

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Dated: May 12, 2025

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## CERTIFICATE OF COMPLIANCE

The undersigned certify that the Joint Motion for Permission to File Under Seal complies with the length and type-size limitations under Federal Rules of Appellate Procedure 27(d)(2) and 32(a). The Motion contains 498 words set in Times New Roman, a proportional font, type-size 14 point. The undersigned certify that the word count stated above was generated by the word-count function of Microsoft Word for Office 365 as specifically applied to include all text, inclusive of footnotes, but exclusive of the caption, signature block, and certificate of compliance.

### KELLEY, WOLTER & SCOTT, P.A.

Dated: May 12, 2025

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*Attorneys for Petitioner Claudia Russ Anderson*

## CERTIFICATE OF SERVICE

I hereby certify that on May 12, 2025, I caused this Joint Motion for Permission to File Under Seal to be hand delivered on the Clerk of the Court for the United States Court of Appeals for the Eighth Circuit. I further certify that on May 12, 2025, I caused a copy of the foregoing to be served by electronic mail upon, and by consent of, the following:

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